

- If the entry is in CAPITAL LETTERS, you must include it in the jury instruction packet
- If the entry is underlined, the parties will supply that instruction.
- An * means that the instruction must be individualized.
- Instruction numbers beginning with “Cr.” refer to the instructions as they are provided on this web page.

JUDGE GONZALES’ STANDARD CRIMINAL JURY INSTRUCTIONS WORK SHEET

I. CRIME CHARGED

- _____ CAPTION; COURT WILL INSTRUCT* Cr.01
- _____ DUTY TO FOLLOW INSTRUCTIONS
- A. ___ (single defendant on trial) Cr.02a
- B. ___ (multiple defendants on trial) Cr.02b
- _____ CHARGE AND PLEA* (supplied by Government)
- _____ BURDEN OF PROOF; REASONABLE DOUBT
- A. ___ (all defendants testify) Cr.03a
- B. ___ (any defendant does not testify) Cr.03b
- _____ SUBSTANTIVE OFFENSE (CODE PROVISIONS/ELEMENTS)
- Use 10th Circuit Pattern Criminal Jury Instructions, with the following exception:
 ___ "on or about" and definitions (if necessary) Cr.04g

II. DEFENSES

Use 10th Circuit Pattern Criminal Jury Instructions

III. EVIDENCE

- _____ EVIDENCE - ARGUMENT OF COUNSEL Cr.14
- _____ JURY NOTETAKING Cr. 14(A)
- _____ DIRECT/CIRCUMSTANTIAL EVIDENCE Cr.15
- _____ CREDIBILITY OF WITNESSES Cr.16

_____ IMPEACHMENT

- A. ___ (inconsistent statement only & no defendant testifies) Cr.17a
- B. ___ (inconsistent statement, a felony conviction & no defendant testifies) Cr.17b
- C. ___ (inconsistent statement & a defendant testifies) Cr.17c
- D. ___ (inconsistent statement & a defendant testifies with a felony conviction) Cr.17d
- E. ___ (witness has felony conviction & deft testifies without a felony conviction) (use with "A") Cr.17e
- F. ___ (witness has felony conviction & deft testifies with a felony conviction) (use with "A") Cr.17f
- G. ___ (bad reputation for truth) (use with one of the above) Cr.17g
- H. ___ (felony conviction & bad reputation for truth) (use with one of the above) Cr.17h

_____ Expert testimony Cr.18

_____ Testimony of accomplice or informer

- A. ___ (accomplice or informer) Cr.19a
- B. ___ (co-defendant who entered into a plea agreement) Cr.19b

_____ Witness on addictive drugs Cr.20

_____ Character evidence Cr.21

_____ Confession; voluntariness

Use 10th Circuit Pattern Criminal Jury Instruction 1.25 (single defendant) or 1.26 (multiple defendants). Combine with 10th Circuit Instruction 1.05.1

_____ Identification testimony Cr.23

_____ Similar acts evidence Cr.24

_____ Use of Spanish Interpreter Cr. 24a

_____ English Transcript Of Spanish Cr. 24b

_____ "Stipulation" Definition Cr. 24c

IV. DELIBERATION

_____ CAUTION; PUNISHMENT

- A. ___ (single defendant & single count) Cr.25a
- B. ___ (single defendant & multiple counts) Cr.25b
- C. ___ (multiple defendants & single count) Cr.25c
- D. ___ (multiple defendants & multiple counts) Cr.25d

_____ JUROR USE OF SOCIAL MEDIA Cr.26a

_____ DUTY TO DELIBERATE Cr.26b

_____ EXPLANATION OF VERDICT FORM(S)
A. ____ (single verdict form) Cr.27a
B. ____ (multiple verdict forms) Cr.27b

_____ VERDICT FORMS(S) *

V. OTHER INSTRUCTIONS

_____ TOOLS OF THE DRUG TRADE (FIREARMS) Cr. 28